

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

)  
**IN RE: REALPAGE, INC., RENTAL** ) **Case No. 3:23-md-3071**  
**SOFTWARE ANTITRUST LITIGATION** ) **MDL No. 3071**  
**(NO. II)** )  
 )  
 ) **Chief Judge Waverly D.**  
 ) **Crenshaw, Jr.**  
 )  
 ) **JURY DEMAND**  
 )  
 ) **This Document Relates to:**  
 ) **3:23-cv-00979**  
 ) **3:23-md-3071**

**UNOPPOSED MOTION TO DEEM**  
**ECI MANAGEMENT, LLC SUBSTITUTED FOR ECI GROUP, INC.**

Plaintiffs in the above-referenced matter transferred to this multidistrict litigation (“MDL”), *Haynes v. RealPage, Inc.*, 3:23-cv-00979, originally named “ECI Group, Inc.” as a Defendant. In their operative Complaint, MDL Plaintiffs also name “ECI Group, Inc.” as a Defendant. Counsel for this entity conferred with Plaintiffs’ Counsel, indicating their belief that the proper business entity to be named (if any) is “ECI Management, LLC.”

The pleadings in the above-captioned matters, including the current operative Complaint, list ECI Group, Inc., rather than ECI Management, LLC. Therefore, as to the above-captioned matters, Case Nos. 3:23-cv-00979 and 3:23-md-3071, Plaintiffs respectfully move the Court to (1) deem “ECI Management, LLC” as substituted for “ECI Group, Inc.”; and (2) terminate “ECI Group, Inc.” as a Defendant on the case dockets. Plaintiffs also submit that filing individual amended complaints in the above actions at this time would not be a good use of party or judicial resources. Accordingly, in the interests of conservation of resources and judicial economy,

Plaintiffs hereby respectfully request that the Court also defer the need for the Plaintiffs in the above-referenced matters to file amended pleadings reflecting this substitution until further order of the Court.

Plaintiffs' Counsel has conferred with counsel for the ECI entities. The ECI entities do not oppose the relief requested in this Motion. Plaintiffs therefore respectfully request the Court to grant the relief requested herein.

Dated: October 24, 2023

/s/ Tricia R. Herzfeld

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*Plaintiffs' Steering Committee Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

*/s/ Tricia R. Herzfeld*  
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